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May 25, 2021

By ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Greene v. City of New York*, 21 Civ. 01552 (JGK)

Dear Judge Koeltl:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for the defendant, City of New York, in the above-titled action. The City writes in response to the May 21, 2021 Court Order to advise the Court that, at this time, it does not intend to move to dismiss the Amended Complaint. The City also writes to respectfully request an extension of time to respond to the Amended Complaint to July 2, 2021. This is the City's first request for an extension of time to answer and plaintiff consents to this request.

The City seeks this extension of time so that it may adequately complete a preliminary investigation into plaintiff's factual allegations and legal claims and to respond appropriately to the asserted claims in the Amended Complaint. The extension of time also accounts for a pre-planned vacation. Accordingly, pursuant to the May 21 Order, the parties will not be appearing for a pre-motion conference on June 8 and will, instead, submit a Federal Rule of Civil Procedure 26(f) report 14 days after the City files its answer. To the extent that the Court intends to re-schedule the June 8 conference as an initial conference, the City asks that it be adjourned until after the City files its answer.

Thank you for your attention to this matter.

Respectfully Submitted,
/s/ Aliza J. Balog
Aliza J. Balog
Assistant Corporation Counsel